

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD OF PUERTO RICO,

As representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.

PROMESA

Title III

No. 17-BK-3283-LS

(Jointly Administered)

This filing relates to PREPA.

**RESPONSE AND OPPOSITION TO ONE HUNDRED EIGHTY-SIXTH
OMNIBUS OBJECTION REGARDING CLAIM NO. 503 - PUERTO RICO ELECTRIC
POWER AUTHORITY**

COMES NOW the Claimant in Claim No. 503, especially Luis P. Costas-Elena, represented by the undersigned and before this Honorable Court responds and opposes the One Hundred Eighty-Sixth Omnibus Objection regarding Claim No. 503.

1. At page 2 of said objection, with the number 12, Claim No. 503 is erroneously sought to be disallowed supposedly because it is duplicative. Claim No. 503 is in addition to Claim No. 502 and is not duplicative of any other claim. Claim No. 503 is especially on behalf of Luis P. Costas-Elena. Claim No. 502 is on behalf of the entirely different person Hazel Russell.

2. Claimant of Claim No. 503 opposes and contests any and all disallowance of the entirely valid and proper Claim No. 503. Claimant demands trial by Jury of any action to disallow this claim.

3. The sought disallowance is contrary to law and fact. Moral damages are personal. Accordingly, the moral damages of Luis P. Costas-Elena are personal to him and are in Claim No. 503. Thus, contrary to the allegation of the One Hundred Eighty-Sixth Motion the sought

disallowance of Claim No. 503 is substantive and illegally attempts to deprive Luis P. Costas-Elena of his rightful Claim No. 503. Regarding Claim No. 503 the One Hundred Eighty-Sixth objection is an illegal taking without due process of law. Claim No. 503 should proceed and is rightful and proper. Claimant of Claim No. 503 invokes his constitutional rights under the Fifth and Fourteenth Amendments to the United States Constitution and demands Trial by Jury against any and all dis-allowance.

4. Claimant reserves the right to supplement, amend and amplify this opposition.

WHEREFORE, the Claimant respectfully requests that this Honorable Court approve and allow Claim No. 503; reject any and all sought disallowance of Claim No. 503; and/or provide Claimant a Trial by Jury.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of May, 2020.

I hereby CERTIFY that the instant Response and Opposition to One Hundred Eighty-Sixth Omnibus Objection Regarding Claim No. 503 - Puerto Rico Electric Power Authority was filed using the CM/ECF System of this Honorable Court which shall notify all Attorneys of record in this case.

Luis P. Costas Elena

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/s/ David W. Roman

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